

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matters of:	
Communications Assistance for Law Enforcement and Broadband Access and Services	ET Docket No. 04-295  RM-10865

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**REPLY COMMENTS OF THE RURAL IOWA INDEPENDENT  
TELEPHONE ASSOCIATION IN SUPPORT OF COMMENTS  
FILED BY THE NATIONAL TELECOMMUNICATIONS  
COOPERATIVE ASSOCIATION**

On November 8, 2004, the National Telecommunications Cooperative Association (NTCA) and the Organization for the Promotion and Advancement of Small Telephone Companies (OPASTCO) filed comments in this docket. Both associations raise important issues and the Rural Iowa Independent Telephone Association (RIITA) urges the Commission to adopt their recommendations.

RIITA is a non-profit association of rural independent telephone companies, representing approximately one hundred and thirty Iowa incumbent local exchange carriers. RIITA's membership is restricted to mutual telephone companies in which at least fifty percent of the users are owners, co-operative telephone corporations or associations, and telephone companies having less than fifteen thousand customers and less than fifteen thousand access lines which serve rural Iowa and are incumbent local exchange carriers as defined in the 1996 Telecommunications Act. In reality, RIITA's membership consists of companies substantially smaller than the access-line limitation demonstrates. The average RIITA member serves

approximately one thousand access lines. RIITA represents the interests of small rural telephone companies.

RIITA agrees with NTCA that providers of broadband access and VoIP should be subject to CALEA. From a functional standpoint, if VoIP providers are not required to comply with CALEA, law enforcement will be impaired from performing its duties for people using VoIP instead of phones utilizing the public switched network.

In addition, RIITA agrees with both NTCA and OPASTCO that extensions are necessary for small rural carriers to smoothly transition to CALEA requirements for packet-mode technology under Section 107(c).

The carriers that are RIITA members do not have the resources to develop compliant technology and must rely on third-party providers. No incentive can be created by forcing small carriers into CALEA violations because the percentage of the market controlled by rural independents is too small to provide any impact on development. The costs associated with Section 109 filings would be a huge burden for our companies.

As mentioned, the size of the average RIITA member company member is approximately one thousand access lines. RIITA's members comply with rules of the FCC and provide cutting-edge technology to rural Iowans. However, it is impossible to comply with FCC rules when the technology needed to comply is either outrageously expensive or simply does not exist. RIITA members are not in a position to develop the technology. And the companies do not have the market power to compel other companies to develop technology faster. As a result, it is imperative that small rural carriers be allowed to receive extensions under Section 107(c).

RIITA urges the FCC to consider the issues facing small rural carriers and allow small rural carriers extensions under Section 107(c). RIITA joins the comments filed by NTCA and OPASTCO in this docket.

Respectfully Submitted,

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